

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

In re:

Iris Energy Limited Securities Litigation

1:24-cv-7046 (PK)

**STIPULATION AND PROPOSED ORDER  
SETTING PLEADING AND BRIEFING SCHEDULE**

Lead Plaintiff Rick Bunney (“Lead Plaintiff”) and Defendants IREN Limited (f/k/a Iris Energy Limited), Daniel Roberts, Williams Roberts, and Belinda Nucifora (“Defendants,” and together with Lead Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

**WHEREAS**, on October 7, 2024, Paul Williams-Israel commenced the above-captioned putative class action by filing a complaint (the “Complaint”) against Defendants asserting claims pursuant to Sections 10(b) and 20(a) of the Exchange Act (15 U.S.C. §§ 78j(b) and 78t(a)) and Rule 10b-5 promulgated thereunder by the SEC (17 C.F.R. § 240.10b-5) (ECF No. 1);

**WHEREAS**, on October 15, 2024, Defendants moved the Court for “an adjournment of any deadline to answer or otherwise respond to the Complaint until after the Court appoints a lead plaintiff and lead counsel” (the “Motion for Extension of Time to Answer”), with the consent of Paul Williams-Israel (ECF No. 9);

**WHEREAS**, on October 21, 2024, the Court granted Defendants’ Motion for Extension of Time to Answer and ordered that: “Within fourteen (14) days of an order by the Court appointing a lead plaintiff and lead counsel, the parties are directed to file a joint

proposed schedule for the filing of any consolidated or amended complaint and for any anticipated motion to dismiss the operative complaint”;

**WHEREAS**, on January 7, 2025, the Court issued an order appointing Rick Bunney as Lead Plaintiff, and Glancy Prongay & Murray LLP and Holzer & Holzer, LLC as Co-Lead Counsel (ECF No. 30);

**WHEREAS**, on January 15, 2025, the Parties met and conferred and agreed to a schedule for the filing of a consolidated amended complaint and a briefing schedule for Defendants’ anticipated motion to dismiss; and

**WHEREAS**, the Parties’ negotiated schedule will not otherwise affect the schedule of the case, as discovery is stayed pursuant to the Private Securities Litigation Reform Act and there are no other events or deadlines currently scheduled;

**NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE**, by and through their undersigned counsel, and subject to this Court’s approval:

1. Lead Plaintiff shall file a consolidated amended complaint on or before March 24, 2025.
2. Defendants shall respond to the consolidated amended complaint, by filing a motion to dismiss or otherwise, on or before May 23, 2025.
3. Lead Plaintiff shall file an opposition to Defendants’ motion to dismiss, if any, on or before July 22, 2025.
4. Defendants shall file a reply in support of their motion to dismiss, if any, on or before September 5, 2025.

Respectfully submitted this twenty-first day of January, 2025.

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*Attorney for Defendants IREN Limited,  
Daniel Roberts, William Roberts, and  
Belinda Nucifora*

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025  
New York, New York

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Hon. Peggy Kuo  
United States Magistrate Judge